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Koninklijke Philips N.V.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

FITBIT, INC.,

Plaintiff,

v.

KONINKLIJKE PHILIPS N.V.,

Defendant.

Case No. 20-cv-02246-RS

**SUPPLEMENTAL DECLARATION OF
JEAN-PAUL CIARDULLO
IN SUPPORT OF**

**KONINKLIJKE PHILIPS N.V.’s
MOTION TO DISMISS AND TRANSFER,
OR IN THE ALTERNATIVE TO STAY**

Date: July 23, 2020

Time: 1:30 PM

Location: Courtroom 3 – 17th Floor
450 Golden Gate Avenue

Honorable Richard Seeborg

I, Jean-Paul Ciardullo, declare as follows:

1. I am an attorney with Foley & Lardner LLP, counsel to defendant Koninklijke Philips N.V.

2. Attached hereto as **Exhibit 2** is a copy of the Declaration of a Mr. Ronald Holthuizen from D. Mass Case No. 1:12-cv-11065-RGS, *Neurografix et al. v. Philips Electronics North America Corp. et al.*,

3. Attached hereto as **Exhibit 3** is a copy of Civil Cover Sheet and Complaint from N.D. Cal. Case No. No. 15-cv-03566-JSC, *Texas Cargo Transp. Am., LLC v. Cal Dive Int'l Austl. PTY Ltd.*

4. Attached hereto as **Exhibit 4** is a copy of the Reply brief on the Motion to Dismiss referenced from C.D. Cal. Case No. CV 13-7102 PA (Ex), *Goes Int'l AB v. Wuzla*.

5. Attached hereto as **Exhibit 5** is a copy of the "stipulation" referenced in *Alpha Tech. U.S.A. Corp. v. N. Dairy Equip., Ltd.*, No. 6:17-cv-1000-Orl-31DCI, 2018 U.S. Dist. LEXIS 9328, at *11-12 (M.D. Fla. Jan. 22, 2018).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: July 6, 2020

/s/ Jean-Paul Ciardullo
Jean-Paul Ciardullo